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September 22, 2016

VIA ECF AND EMAIL

Honorable Stuart M. Bernstein
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004

Re: SIPC v. BLMIS, Adv. Pro. No. 08-01789 (SMB) – Profit Withdrawal Litigation

Dear Judge Bernstein:

We represent Doctors Norman and Joel Blum, who are Claimants in the above-referenced matter.

We respectfully request permission to file a brief in Opposition to the Trustee's Amended Motion for an Order Affirming Treatment of Profit Withdrawal Transactions in excess of the page limit specified in your Chambers' Rules but no more than 70 pages in length. This increase in the page limit is necessary to fully address the hundreds of pages of briefing filed by the Trustee and the Securities Investor Protection Corporation ("SIPC") in this proceeding.

Counsel for the Trustee and SIPC consent to this request. If the Court has any questions, please do not hesitate to have a member of Your Honor's staff contact the undersigned. We appreciate Your Honor's attention to this matter.

Respectfully submitted,


Richard A. Kirby
Partner

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